Case 2:16-cv-01110-RCJ-PAL Document 9 Filed 07/04/16 Page 1 of 2

1	Reza Mirzaie, Esq.	
2	(Pro Hac Vice to be submitted) rmirzaie@raklaw.com	
3	Paul S. Kroeger, Esq. (Pro Hac Vice to be submitted)	
	pkroeger@raklaw.com	
4	Stanley H. Thompson, Jr., Esq. (Pro Hac Vice to be submitted)	
5	sthompson@raklaw.com C. Jay Chung, Esq.	
6	(Pro Hac Vice to be submitted)	
7	jchung@raklaw.com RUSS, AUGUST & KABAT	
8	12424 Wilshire Boulevard, 12 th Floor Los Angeles, California 90025	
	Telephone: (310) 826-7474	
9	Facsimile: (310) 826-6991	
10	Mark Borghese, Esq. Nevada Bar No. 6231	
11	mark@borgheselegal.com	
12	BORGHESE LEGAL, LTD. 10161 Park Run Drive, Suite 150	
13	Las Vegas, Nevada 89145 T: (702) 382-0200	
14	F: (702) 382-0212 Attorneys for Plaintiff	
		CT COURT
15	UNITED STATES DISTRICT COURT	
16	DISTRICT OF NEVADA	
17	2 WAY COMPLETING ING A NEW 1- N	C. N. 4.16 . 01110 DCI DAI
18	2-WAY COMPUTING, INC., a Nevada) (Case No.: 2:16-cv-01110-RCJ-PAL
19	corporation,	UNOPPOSED MOTION AND
20) [PROPOSED] ORDER TO EXTEND DEADLINE FOR DEFENDANT TO
		RESPOND TO COMPLAINT
21	VS.)	FIRST REQUEST)
22	GRANDSTREAM NETWORKS, INC., a	,
23	Delaware corporation,	
24	Defendant.	
25	Plaintiff 2 Way Computing Inc. ("Plaintiff") h	araby files this Unapposed Maties as

Plaintiff 2-Way Computing, Inc. ("Plaintiff") hereby files this Unopposed Motion and [Proposed] Order to Extend Deadline for Defendant to Respond to the Complaint in accordance with LR IA 6-1 and LR IA 6-2. This is the first request to extend the proposed deadline. This

28 request is not made after the response deadline which is currently June 27, 2016.

26

27

Case 2:16-cv-01110-RCJ-PAL Document 9 Filed 07/04/16 Page 2 of 2

The Complaint (Doc. 1) was filed on May 17, 2016 and was served on Grandstream 1 2 Networks, Inc. on or about June 6, 2016. The current deadline to respond to the Complaint is 3 June 27, 2016. 4 The parties believe that the litigation of this matter will be best served by allowing an 5 additional fifteen (15) days to discuss possible settlement of this matter and allow Defendant 6 additional time to investigate the claims of the Complaint and obtain Nevada counsel. Because 7 an attorney for Defendant has not made an appearance in this case, Plaintiff files this motion to 8 extend Defendant's deadline as an unopposed motion. 9 Accordingly, Plaintiff respectfully requests that this Court grant its request to continue 10 the deadline for Defendant to respond to the Complaint until July 12, 2016. 11 12 BORGHESE LEGAL, LTD. 13 /s/ Mark Borghese 14 DATED: June 27, 2016. Mark Borghese, Esq. 15 10161 Park Run Drive, Suite 150 Las Vegas, Nevada 89145 16 RUSS, AUGUST & KABAT 17 Reza Mirzaie, Esq. Stanley H. Thompson, Jr., Esq. 18 12424 Wilshire Boulevard, 12th Floor Los Angeles, California 90025 19 Attorneys for Plaintiff 20 **ORDER** 21 22 IT IS SO ORDERED. 23 24 PEGGY A. LEEN 25 UNITED STATES MAGISTRATE JUDGE 26 DATED: July 1, 2016 27

BORGHESE LEGAL, LTD.
10161 PARK RUN DRIVE,
SUITE 150
LAS VEGAS,
NEVADA 89145
(702) 382-0200